

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,)

Plaintiff,)

v.)

BOLIVARIAN REPUBLIC OF VENEZUELA,)

Defendant.)

Misc. No. 17-151-LPS

**SPECIAL MASTER'S MONTHLY REPORT
FOR THE PERIOD ENDED APRIL 30, 2023**

Dated: June 2, 2023

ROBERT B. PINCUS in his capacity as
Special Master for the United States District Court for the District of Delaware
PO Box 4570
Wilmington, DE 19807

June 2, 2023

BY HAND DELIVERY & CM/ECF

The Honorable Leonard P. Stark
United States District Court for the District of Delaware
J. Caleb Boggs Federal Building
844 North King Street
Wilmington, DE 19801-3570

Re: *Crystallex International Corp. v. Bolivarian Republic of Venezuela*, D. Del. C.A. No. 1:17-mc-00151-LPS; Special Master's Status Report for the Period Ended April 30, 2023 (this "**Report**")

Dear Judge Stark:

By order dated April 13, 2021 [D.I. 258], Your Honor appointed me as Special Master in this case to design, oversee, and implement the sale of Petroleos de Venezuela, S.A.'s ("**PDVSA**") shares of PDV Holding Inc. On May 27, 2021, Your Honor issued the *Order Regarding Special Master* [D.I. 277] (the "**May 27 Order**")¹ setting forth, among other things, various obligations and duties applicable to the Special Master, the Parties, and ConocoPhillips (together with the Parties, the "**Sale Process Parties**"), including my obligation to provide the Court with a periodic status report concerning my progress and efforts. The last report that I submitted to the Court was for the period ended January 31, 2023 [D.I. 531] (the "**January 2023 Report**"). I hereby write to provide this Report for the period since the January 2023 Report through April 30, 2023.

Summary of Events Taking Place this Period

During this period, I have undertaken the following actions, with the assistance of my advisors (collectively, the "**Advisors**"), in accordance with my duties and obligations set forth in the May 27 Order:

- Continued to engage with representatives of the Executive Branch.
- Prepared and filed the Special Master's Monthly Report for the period ended January 31, 2023 [D.I. 518].

¹ All capitalized terms used but not otherwise defined herein, have the meanings ascribed to such terms in the May 27 Order.

The Honorable Leonard P. Stark

June 2, 2023

Page 2

- Prepared and filed a letter in response to the questions set forth in the Court's Memorandum Order of February 17, 2023 [D.I. 526].
- Prepared and filed a letter in response to the Court's Oral Order dated February 23, 2023 [D.I. 529].
- Prepared and filed a letter in response to letter briefs filed by the Venezuela Parties in response to the Court's Oral Order dated February 23, 2023 [D.I. 532].
- Prepared and presented arguments on the matters before the Court at the March 30, 2023 hearing.
- Met and conferred with the Sale Process Parties and other parties in interest and prepared and filed a joint status report related thereto pursuant to the Court's Oral Order dated March 30, 2023 [D.I. 541].
- Prepared and filed a response and a declaration to the Venezuela Parties' motion to stay pending the resolution of a mandamus petition in response to Court's Order dated April 10, 2023 [D.I. 547 and 548].
- Prepared and filed the Supplemental Report and Recommendation as directed by the Court's Sale Procedures Order [D.I. 553].

Statement of Fees and Expenses

The May 27 Order requires that I submit an Itemized Statement of my fees and expenses to the Court. During the period from February 1, 2023 through April 30, 2023, my Advisors and I have incurred an aggregate of \$1,300,220.95 of fees and expenses in connection with carrying out my duties as Special Master, as shown in the table below.

Special Master	\$44,175.00
Weil, Gotshal & Manges LLP	\$753,719.34
Evercore	\$400,469.03
Jenner & Block LLP	\$58,671.76
Potter Anderson & Corroon LLP	\$43,185.82
Total	\$1,300,220.95

This amount includes the monthly fees and expenses of counsel in connection with the matters described above and the monthly fees of my financial advisor, Evercore, for March and April in connection with their assistance in preparation of the Supplemental Report and continued analysis of the recommendation given therein. The Itemized Statement, attached as Annex N hereto, contains a breakdown of such fees and expenses among my Advisors and myself. I respectfully request that Your Honor determine that such fees and expenses are regular and reasonable. A proposed form of order is enclosed for Your Honor's consideration.

The Honorable Leonard P. Stark

June 2, 2023

Page 3

I am available at the convenience of the Court, should Your Honor have any questions.

Respectfully Yours,

/s/ Robert B. Pincus

Robert B. Pincus, in my capacity as
Special Master for the United States
District Court for the District of
Delaware

Enclosures

cc: All Counsel of Record (via CM/ECF and E-Mail)